

ATTACHMENT 2

DOCUMENT REVIEW DRAFT STANDARD OPERATING PROCEDURES FOR SOIL,  
FIELD SAMPLING, AND APPENDIXES A AND B, ROCKY FLATS PLANT

GENERAL COMMENTS

- 1 The necessity for having two separate soil sampling procedures is not clear. We recommend that these two procedures be combined into a single standard operating procedure (SOP).
- 2 The approval signature on each title page should identify the authority of the signatory.
- 3 We recommend that references to the Department of Energy's Rocky Flats Plant (RFP) be identified as the "Rocky Flats Plant," not as "Rocky Flats."

SPECIFIC COMMENTS:

Soil SOP

1. Table of Contents, p. 1. The first Table of Contents heading should either be centered or deleted from this listing.
2. Section 2.0, p. 2. The scope of the SOP for soil is not identified in the text. We recommend that the scope be clearly defined.
3. Section 2.0, p. 2. The last paragraph appears to be a justification for performance of this SOP. It would be more appropriate to delete this paragraph or integrate this paragraph into the front of the section.
4. Section 4.0, p. 3. The references do not appear to be in alphabetical, chronological, or presentation order. The references would be more useful if they followed some standard arrangement that corresponded to the text.
5. Section 6.2.1, p. 7. The second bullet indicates that easy access to the vertical face is a requirement. It is not indicated whether access is for direct visual observation by field personnel or for analytical instruments. Clarification of access should be indicated.
6. Section 6.2.1, p. 8. It is unclear from the first paragraph whether the soil profile description detailed in the *Soil Survey Manual* and SOP 3.2 are the same. It would be appropriate to identify whether the two are identical systems.
7. Section 6.2.1, p. 8. The third bullet and its subdivisions are internally inconsistent and difficult to comprehend. It is unclear why analyses of soil samples are not being examined for contaminants of concern, radionuclides, or other contaminants that could impact the Environmental Evaluation.

Removal of soil that may have originated at another location appears to require a subjective interpretation of the field investigators. If imported soils have been introduced into the sampling area, they may be the source of contamination. The purpose for this requirement

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is unclear and brings into question the criteria for site selection. We recommend that the soil removal requirements be reconsidered.

The first paragraph appears to contain two distinctly different elements. The requirements imposed for laboratory analysis do not need to be detailed in the field sampling procedure

- 8 Section 6 2 1, p 9 The Soil Field Sample Form (5 12B) is not present in this SOP If the form has not been developed, we recommend that the tense of the text be changed
9. Section 6 2.2, p 10 It is not clear what materials will be used to refill a pit or auger hole It would be appropriate to consider acceptable backfill materials
- 10 Section 7 2, p 11 The period for retention of Form 5.12B by the field contractor should be specified and referenced to the SOP for data management
- 11 Form 5 12A. The line entitled "Vegetation Special and % Composition" should indicate the direction, area, and distance from the soil sample location from which the vegetation was surveyed

FSP SOP

- 12 Section 6 0, p 4 It is unclear whether the three groups identified in the third sentence are data Data may be obtained from these activities We recommend that these three elements be rewritten to correspond to the subject

The identification of the type of habitat affected presumes an effect. It would be more appropriate to indicate "type of potentially affected habitat."

Bullet four should also include sample size as an identifier.

6.1

- 13 Section ~~13~~ p 6 We recommend that another term be substituted for *may* in the first sentence of the second paragraph If the purpose of identifying reference areas is to provide a comparison with potentially contaminated areas, the statement should not be qualified

The last sentence indicates that selection procedures for reference areas could be different from those employed for study areas It is not clear how application of different selection procedures will impact the experimental design and interpretation of data

Species Codes Appendix A

14. Appendix A, Sect. 2.0, p. 2: The second sentence should be rewritten to indicate that the list is intended for use in conjunction with collection and handling of biological data
15. Appendix A, Sect. 4 0, p 4 It is not clear from the text whether species codes are currently being used for other environmental activities at RFP. If other codes are being employed on-site, it would be appropriate to indicate how they will be integrated into the proposed Species Code List

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